

Petition of New England Gas Company for Approval of
its Long-Range Forecast and Resource Plan for the
five-year period November 1, 2003 through October 31,
2008 pursuant to G.L. c. 164, §§ 69 (I) *et seq.*

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6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term “Company” refers to New England Gas Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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D.T.E. 04-6

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

AG-1-1 Did the Company experience or exceed design day conditions during this past winter? If yes, please provide, for each division, the actual sendout statistics by class for the 24 hours of the peak day. This data should provide the EDD, peak demand and consumption by rate class, the actual resources and associated volumes that were used to satisfy the demand, and the cost of each resource utilized. For each division, provide the number of customers that were curtailed or asked to reduce load, the amount of load curtailed or reduced, and the number of hours load was curtailed or reduced. Also, for each division, provide the imbalance amounts associated with under-deliveries for competitively supplied customers and the amount of penalties assessed. Include all supporting data, calculations and assumptions.

AG-1-2 Did the Company experience or exceed cold snap conditions during this past winter? If yes, please provide, for each division, the actual sendout statistics by class for the cold snap period. This data should provide the EDDs, demand and consumption by rate class, the actual resources and associated volumes that were used to satisfy the demand, and the cost of each resource utilized. For each division, provide the number of customers that were curtailed or asked to reduce load, the amount of load curtailed or reduced, and the number of hours load was curtailed or reduced for each day during the cold snap. Also, for each division, provide the daily imbalance amounts associated with under-deliveries for competitively supplied customers and the amount of penalties assessed. Include all supporting data, calculations and assumptions.

- AG-1-3 Does the Company plan to modify its Forecast and Supply Plan in any way to reflect its experience during this past winter? If yes, please explain and describe the modifications and provide the date when the modifications will be filed. If no, please explain why.
- AG-1-4 Refer to page 2. Please provide a detailed analysis of and quantify all costs and benefits related the integration of the Company's gas-supply management and dispatch activities that will be reflected in a combined Cost of Gas Adjustment. Include all supporting documentation, workpapers, calculations and assumptions.
- AG-1-5 Refer to pages 32-33. Why is the Company procuring its supply through a 6 month capacity/asset management contract? Did the Company consider entering into a longer term contract? Provide the analysis supporting the decision to rely on a 6 month contract.
- AG-1-6 Refer to pages 43-44. Please provide the analysis and all supporting documentation related to the Company's evaluation of whether "it would be better to self-manage supply longer term or to do an RFP for a long-term asset management arrangement."
- AG-1-7 Refer to page 44. Please provide all analyses and documentation supporting the statement that "(T)he results of the recent asset management RFP indicate that a longer term asset management arrangement may reduce costs." Include an explanation of the specific costs that may be reduced and quantify the amount of the reduction. Provide all supporting documentation, calculations and assumptions.
- AG-1-8 Please state what impact, if any, the proposed Fall River Weaver's Cove LNG facility may have on the Company's Forecast and Supply Plan. Indicate whether the Company, in connection with the proposed facility, has contacted or otherwise discussed with Weaver's Cove Energy LLC or any of its affiliates and representatives the purchase and/or storage of gas supplies.

Dated: April 12, 2004